

REMARKSI. Introduction

In response to the Office Action dated August 13, 2003, no claims have been cancelled, amended, or added. Claims 1-69 remain in the application. Re-examination and re-consideration of the application is requested.

II. Prior Art RejectionsA. The Office Action Rejections

In the Office Action, claims 1, 4-7, 24, 27-30, 47, and 50-53 are rejected under 35 U.S.C. §103(a) as being unpatentable over Dale, U.S. Patent No. 6,272,673 B1 (Dale) in view of Kyojima et al., U.S. Patent No. 5,920,879 (Kyojima); claims 2, 17-18, 25, 40-41, 48, and 63-64 are rejected under 35 U.S.C. §103 as being unpatentable over Dale in view of Kyojima, as applied to claims 1, 24, and 47, and further in view of Bray, Extensible Markup Language (XML): Part I. Syntax, (Bray); claims 3, 26, and 49 are rejected under 35 U.S.C. §103(a) as being unpatentable over Dale in view of Kyojima and Bray as applied to claims 2, 25, and 48, and further in view of Kirsanov, XML DTDs and Valid XML Documents (Kirsanov) and Bray, Document Content Description for XML (Bray 2); claims 8-10, 21, 31-33, 44-45, 54-56, and 67-68 are rejected under 35 U.S.C. §103(a) as being unpatentable over Dale in view of Kyojima as applied to claims 1, 24, and 47, and further in view of Softquad HotMetalPro 3.0 User's Manual (Softquad); claims 11-15, 34-38, and 57-61 are rejected under 35 U.S.C. §103(a) as being unpatentable over Dale, Kyojima, Softquad as applied to claims 10, 33, and 56, and further in view of W3C Extensible Markup Language – XML, 1.0 (W3C); claims 16, 23, 34-37, 39, 46, 57-60, 62, and 69 are rejected under 35 U.S.C. §103(a) as being unpatentable over Dale in view of Kyojima as applied to claims 1, 24, and 47, and further in view of W3C; and claims 19-20, 42-43, and 65-66 are rejected under 35 U.S.C. §103(a) as being unpatentable over Dale in view of Kyojima and Bray as applied to claim 18, and further in view of Softquad.

Applicant's attorney traverses these rejections.

B. Applicant's Independent Claims

Independent claims 1, 24 and 47 are generally directed to generating a document editor. Claim 1 is representative and comprises:

(a) generating one or more class specifications in the computer from a schema for the document, wherein the class specifications identify user interface components of the editor

corresponding to entities defined in the schema; and

(b) instantiating one or more objects in the computer from the class specifications to invoke the editor.

C. The Dale Reference

Dale describes a mechanism for automatically establishing connections between executable components of a hypertext-based application is provided. An application created using the mechanism includes a plurality of hypertext-based pages, at least some of which incorporate executable components. The application is invoked by a hypertext request for a page from a browser running on a client tier. An application server responds to the request by retrieving the requested page and assigning any components incorporated therein to the proper tier for execution. The mechanism provides a single model by which any executable component can be specified by an application developer for execution on any tier on the network or made subject to an automatic, dynamic tier assignment by the application server. Components of a given application can be distributed across, and specified for execution on, three or more different tiers and moved from tier to tier. An application developer can use a conventional hypertext editor to integrate selected components into extended hypertext pages to create an application.

D. The Kyojima Reference

Kyojima describes a document structure composing apparatus to judge a short part based upon the structure of the whole document, perform processing for complementation and compose document structure according to a desired document class. Complementation specification storage means stores the specification of complementation for document structure. Complementation means applies processing for complementation to pre-complemented document structure. Correlating rule storage means stores a rule for correlating components between different document classes. Document structure converting means converts an original document which meets the structural constraint of a specific document class to structure according to another document class according to the correlating rule. The original document is first converted from structure according to the specific document class to structure nearly according to a desired document class by the document structure converting means. The correlating rule required for conversion is stored in the correlating rule storage means. Afterward, processing for complementation based upon the specification of complementation stored in the complementation specification storage means is

executed by the complementation means and document structure according to a desired document class is composed.

E. Applicant's Claims Are Patentable Over The References

Applicant's independent claims are patentable over the references because they recite a novel and nonobvious combination of elements. None of the references, taken individually or in any combination, teaches or suggests this combination of elements.

The Office Action cites Dale as teaching the limitations of Applicant's independent claims directed to "generating one or more class specifications in the computer," at col. 10, lines 50-59. However, the complete limitation of Applicant's independent claims recites "generating one or more class specifications in the computer from a schema for the document, wherein the class specifications identify user interface components of the editor corresponding to entities defined in the schema," and the complete limitation is not shown by Dale. In contrast, the editor in Dale merely constructs web-based applications, wherein the web pages include tags to applets that may be downloaded when the pages are accessed, and the director component is merely an applet interconnects other components (applets).

The Office Action also cites Dale as teaching displaying a graphical user interface and using an editor to integrate components into a hypertext page to create an application, and that Dale's editor allows text to be combined with various components, at the Abstract and columns 10-20. However, as noted above, the complete limitation of Applicant's independent claims recites "generating one or more class specifications in the computer from a schema for the document, wherein the class specifications identify user interface components of the editor corresponding to entities defined in the schema," and the complete limitation is not shown by Dale. In contrast, Dale's editor, which is used to construct web-based applications including web pages having references or tags to applets, is not generated from class specifications that are generated from a schema for the document, wherein the class specifications identify user interface components of the editor corresponding to entities defined in the schema.

In addition, the Office Action cites Dale as teaching "instantiating one or more objects in the computer from the class specifications," at col. 10, lines 60-63, as Dale describes instantiating components, particularly Java components, at col. 5, lines 7-9. However, the complete limitation of Applicant's independent claims recites "instantiating one or more objects in the computer from the class specifications to invoke the editor," in the context where the class specifications are generated

from a schema for the document and identify user interface components of the editor corresponding to entities defined in the schema, and the complete limitation is not shown by Dale. In contrast, the components described in Dale comprise objects instantiated from some unspecified class specifications, but they are not class specifications generated from a schema for the document that identify user interface components of the editor corresponding to entities defined in the schema, and these components or objects described in Dale are invoked by the web pages, and do not themselves invoke the editor that constructs the web pages.

Finally, the Office Action admits that Dale does not explicitly state that the components are class specifications, but cites Kyojima, at the Abstract and cols. 1-4, as disclosing the generation of "class specifications" from "schemas." Applicant's attorney disagrees. Nowhere does Kyojima teach or suggest class specifications generated from a schema for a document, in the context where the class specifications identify user interface components of the editor corresponding to entities defined in the schema and are instantiated as objects to invoke the editor. In contrast, Kyojima merely describes document structure conversion, wherein the term class is used to refer to a type of document structure.

Consequently, Applicant's attorney respectfully submits that the combination of Dale and Kyojima does not render obvious the limitations of Applicant's independent claims. Indeed, it would only be with hindsight to assert that the specific limitations of Applicant's claims are rendered obvious by this combination.

Moreover, the other references fail to overcome the deficiencies of Dale and Kyojima. Recall that the other references were only cited against dependent claims 2-3, 8-23, 25-26, 31-46, 48-49 and 54-69, in combination with Dale and Kyojima.

Applicant's attorney asserts that the differences between Applicant's claimed invention and the cited references result in operational advantages of the Applicant's invention over the cited references. In addition, Applicant's invention solves problems not recognized by the cited references.

Thus, Applicant's attorney submits that independent claims 1, 24 and 47 are allowable over the cited references. Further, dependent claims 2-23, 25-46 and 48-69 are submitted to be allowable over the cited references in the same manner, because they are dependent on independent claims 1, 24 and 47, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-23, 25-46 and 48-69 recite additional novel elements not shown by the cited references.

III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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